St. PAUL ISLAND RAB AGENDA 04 November 2003

8:30 A.M. – 8:40 A.M. Opening and Introductions Island RAB Chair Distribution of February 13, 2003 RAB minutes for review	
8:40 - 8:45	Modifications to Agenda
8:45 - 9:15	Review of By-Laws and Membership
09:15-10:30	Results of 2003 Cleanup Activities (NOAA Staff) Former Alaska Dormitory Decommissioned Power Plant Fuel Transfer Facility and DPP Annex Former Gasoline/Diesel Fuel Drum Storage Area Fouke Bunkhouse/ Old Barreling Shed Tract 50 Former Gas Station and Garage Anderson Building and Five Car Garage (Mike's Auto) Parcel 6 F (Headstart Building and Duplex) Lot 102 (former teacher housing) Equipment Shed Former Diesel Tank Farm Cascade Building AST Saddles Blubber Dump – ETC Site U.S. Navy Radio Complex (FUDS Designation)
10:30-10:45	NOAA Cleanup Activities During Summer of 2004 (NOAA Staff) Ice House Lake Lukanin Bay Contaminated Soils Site By-Products Plant (Diesel Seep Site) Vehicle Boneyard
10:45-11:00	Review of Groundwater Well Locations and Investigations (NOAA Staff) and 10x Rule Update
11:00-11:15	Landfill Closure and Petroleum Contaminated Soil Stockpile (Lindsay)
11:15:11:30	Site Status (Lindsay)
11:30-11:45	New Landfill Construction (City of St. Paul)
11:45 –12:00 (noon)	Public Comments/Next Meeting/Adjourn

St. Paul Island Restoration Advisory Board Meeting Wednesday, November 4, 2003 St. Paul, Alaska

Participants:

Victor Merculief, Sr. (co-chair, TDX)

Pat Montanio (co-chair, NOAA)

Michael Baldwin (BSE)

Nir Barnea (NOAA)

Dave Bates (North Wind)

Jason Bourdukofsky (St. Paul, at large)

Dennis Bourdukofsky (Delta Western)

Thomas Bourdukofsky (BSE)

Ellen Clark (NOAA)

Brian Croft (Tetra Tech)

Daria Dirks (BSE)

Greg Gervais (NOAA)

Elary Gromoff (Aluet Corp.)

Louis Howard (ADEC)

Merwin Johnson (Kelly Ryan)

Louis Jones (City of St. Paul)

Jason Kozloff (BSE)

John Kushin (BSE)

Aquilina (Debbie) Lestenkof (Tribal Eco)

Phillip Lestenkof

John Lindsay (NOAA)

Myron Melovidov (City of St. Paul)

John R. Merculief (City of St. Paul, manager)

Travis Merculief

Laura Murray (NOAA)

Anthony Philemonoff (TDX)

Ron Philemonoff (TDX)

Haretina Porath

Joe Reller (City of St. Paul)

Frank Shane (BSE)

Julie Shane (BSE)

Walter Shane

Paula Souik (NOAA)

Robert Taylor (NOAA)

Jim Wright (NOAA)

Jesse Zacharof (BSE)

Richard Zacharof (Tribal Government)

Phil Zavadil (Tribal Eco)

8:30 AM: VIEWING OF THE 2003 CLEANUP VIDEO

NOAA opened the meeting with a St. Paul Island field season 2003 video presentation. This presentation was shown to introduce the results of the 2003 cleanup to be discussed later on in the meeting.

OPENING AND INTRODUCTIONS

- Victor Merculief called the meeting to order at 9:09 a.m.
- People introduced themselves and stated their affiliation.
- Distribution of June 9, 2003 RAB minutes for review
- Distribution of February 13, 2003 RAB minutes for review
- Distribution RAB by-laws

MODIFICATIONS TO AGENDA

- June 2003 RAB meeting minutes
- June 2003 RAB subcommittee meeting agenda items, in particular the resolution that was signed and the appointment of Phil Zavadil to the RAB

REVIEW OF MINUTES

- <u>June 9, 2003</u>: page 2, third paragraph, states that Phil Zavadil wishes to strike his comments because they were incompletely recorded. No other corrections. Minutes approved with correction. Minutes will be put in final form and circulated to RAB members.
- <u>February 13, 2003</u>: suggested that minutes be tabled until they can be discussed/approved at a joint STG-SNP RAB meeting. Minutes were tabled.
- <u>June 18, 2003</u>: There was a question about distributing minutes from another meeting, a special meeting held in June. Myron asked what that meeting's purpose was. Victor B. Merculief said it was to discuss cleanup options for the petroleum contaminated soil (PCS); Phil Zavadil was also appointed as a RAB member representing IRA, replacing Mike Z. Apparently, 2/3 of the RAB members were present.
 - John Lindsay said NOAA received a copy of a resolution from that meeting. However, NOAA does not believe that meeting was consistent with RAB by-laws and therefore does not consider it an official meeting. NOAA was not appropriately notified of it and thus could not participate in it or co-chair the meeting.
 - It was suggested that the June 18 meeting might be considered a subcommittee meeting. If so, minutes from it should be provided to the SNP RAB.
 - A great deal of discussion followed regarding the types and definitions of committees allowed under the by-laws (see below).
 - Ron Philemonof moved to ratify the decisions made during the June 18, 2003 meeting, specifically Phil Zavadil's appointment as a RAB member and the resolution. Pat Montanio asked to have a copy of the resolution distributed to the group prior to a vote. All agreed and took a break to get a copy of the resolution.

REVIEW OF RAB BY-LAWS

• Elary Gromoff indicated the by-laws do state both the island co-chair and the NOAA co-chair must be present for RAB meetings.

- Victor said the members should be able to meet without government sanction.
- John Lindsay said having an ad hoc meeting without involvement by NOAA violates the mission statement of the RAB as written in the Charter and By-laws.
- Elary explained the standing committees on each island were meant to alleviate problems with travel and mutual schedules, so that each island can come up with their own concerns and then share with whole RAB during joint meetings.
- Elary also said the subcommittees were meant to allow issues discussed in Anchorage to be disseminated to the local communities.
- John Lindsay said in 4.5 years he's not aware of the subcommittees disseminating the information in a public forum.
- The NOAA co-chair suggested that we discuss/clarify who is on the RAB and how the standing committee is defined, and subcommittee is defined.
- Ultimately, it was decided that separate island meetings without NOAA present should be considered subcommittee meetings. To officially get issues on the record, they must be discussed as part of a *full RAB* meeting (meeting where SNP and STG RAB members, NOAA and State are invited) or a SNP *standing RAB committee* meeting (meeting where SNP RAB members, NOAA and State are invited).
- Island co-chairs can call subcommittee meetings, which in turn bring issues to the standing committee.

REVIEW OF RAB MEMBERSHIP

• Those who identified themselves as RAB members on the sign-in sheet had their names called and then stated what entity they represent on the RAB.

Jason Bourdukovsky (At Large)

Elary Gromoff (The Aleut Corporation)

Louis Howard (ADEC-Non Voting Member)

Debbie Lestenkof (At Large)

Myron Melovedov (City of SNP)

John R. Merculief (City of SNP)

Victor Merculief (TDX)

Pat Montanio (NOAA-Non Voting Member)

Anthony Philemonoff (TDX, alternate for Victor Merculief)

Ron Philemonoff (TDX)

Mike Zacharof (IRA, absent)

Richard Zacharof (IRA, absent but summoned)

- With eight voting RAB members present there was a roll call vote to replace Mike Zacharof with Phil Zavadil (IRA) on the RAB. Seven members voted "yes." There was one absention. Phil was elected to the RAB and then had voting authority for the remainder of the meeting.
- Richard Zacharof of IRA arrived at 10:20 a.m.
- John Lindsay indicated that RAB membership clarification is important so that NOAA can ensure the members receive important project documents. Ron Philemonof said there are other places to receive documents, like the school library (repository) and Aleutian Pribilof Island Association (APIA).

• NOAA asked about the School District's participation in the RAB and was told that everything that comes from the RAB goes to the school.

DISCUSSION OF RESOLUTION FROM JUNE 18 MEETING

- With a copy of the resolution now in hand, Ron moved to approve/ratify Resolution 03-01, prepared June 18, 2003. Elary seconded.
- Elary asked Ron to explain the details behind this resolution.
- Jason explained that during the June 8, 2003 SNP RAB meeting John Lindsay said members should put their opinions in writing. Jason thought a resolution was a good and powerful way to tell NOAA of RAB community members' objections to stockpiling contaminated soil at the landfill.
- John R. Merculief asked Louis Howard to clarify whether the second "whereas" in the resolution is correct relative to it being a violation of State regulations to move the PCS outside of the Ten Times Rule area. Louis said no, the PCS stockpiled at the landfill is consistent with state regulations.
- John R. also asked about the statement regarding the potential impact to groundwater drinking water supply. John Lindsay said the USCG commissioned a study that showed groundwater flows toward the Bering Sea in the area of the landfill. The City commissioned a similar study and had the same conclusion. John L. added that the USCG release is closer to the drinking water wells with no signs of contamination in the drinking water. Furthermore, only one NOAA well of many has shown contamination. The contamination was found during only one round of sampling and the result is suspect. The suspect sample was from a well closer to the Bering Sea than the other wells that have shown no signs of contamination.
- TDX objected to the monofill for various reasons, but the main one was the fear of it impacting drinking water. The TDX board is prepared to offer an alternative location, as ADEC has indicated it should. TDX offered the Vehicle Boneyard as an alternative site.
- Pat Montanio clarified that NOAA has not made a final decision regarding how to handle the PCS and that alternatives are being evaluated.
- Diodor asked whether off-island disposal had been considered. John Lindsay clarified that this was and is being considered as one alternative, but that in the past RAB members said they did not want the PCS to be shipped off island as the soils are valuable and belong on the island. Elary said they said this because soil is a valuable commodity, so they wanted the soils to be treated and reused (e.g., as cover for future landfill, resurface borrow areas).
- John L. said the concept of treating soil on island was a result of the desire of the RAB members to keep the soil on island. An air rotary kiln was not previously seen as a viable option by NOAA. Shipping soils off island was seen as the most cost effective option at the time. The RAB members did not like this option. USCG then brought the possibility of using an enhanced thermal conduction (ETC) system to John's attention and the decision was made to use it. While using this technology, NOAA was aware that an approved monofill was an option, but it was not until Congress told us we had to cut costs and time (because our authorization will not extend beyond FY05) that NOAA entertained a monofill as an option.

- John L. asked the RAB to clarify whether shipping contaminated soil off the island is an option in their minds.
- Ron said if NOAA is not going to clean the soil, they don't want it on the island.
- Diodor suggested using power from the windmill as a way to run equipment to treat soil on island.
- Elary said the Aleut Corp. wants to be compensated for soil shipped off island.
- Ron said though TDX proposed an alternative location for the PCS, their preference is to send soil off island if not treated.
- Myron asked if shipping PCS off island would take more money away from the rest of cleanup. John Lindsay said NOAA has hired a contractor to evaluate all the options, including cost. NOAA has been told (including by TDX) to clean up sites to be transferred. NOAA does not transfer properties until they're cleaned up. We've had to split resources between site cleanup and soil treatment. Decisions in Congress have caused us to change our plans so that work may be completed by the end of 2005. The work crews have made tremendous progress this year, though it will still be tight if we get all authorized funds thorough 2005.
- Debbie asked about the details of natural attenuation and bioremediation. John
 Lindsay said NOAA looked into this, and the vendors would not guarantee their
 processes would meet State cleanup levels. These discussions occurred about 4 years
 ago, Ray Dronenburg of ADEC was involved. We've asked our contractor to reevaluate bioremediation as an alternative. The monofill wouldn't be a sterile
 environment so some attenuation could occur.
- Elary asked if contaminated soils could be mixed with other soil potentially for use in road bedding? Louis said this is potentially an option. Later he clarified that he meant only that it could be batched for cold asphalt.
- John R. Merculief asked if the PCS could be used for landfill cover material. John Lindsay said Leslie Simmons of ADEC could answer specific issues. John L. believed this was discussed with Leslie and the concentrations we have would be too high.
- Ron Philemonof asked to revise the resolution to delete the line about meeting the State of Alaska's regulations, as well as to add that contaminated soils must be treated or removed from island if not treated, with "treated" defined as remediated consistent with State requirements (excluding monofilling).
- John R. Merculief asked whether an assessment should be done of the alternative monofill location before proposing it. There are purportedly three viable aquifers on island, so how do we know the alternative location won't affect groundwater? Ron said they assumed (1) it wasn't connected to the existing drinking water supply, (2) Polovina Hill is in the way, and (3) the Vehicle Boneyard site already is contaminated.
- Phil Zavadil suggested adding the monofill (in the best location relative to risk) to the resolution as a third alternative and a last resort.
- It was suggested that someone should revamp the resolution based on above discussion during lunch and present it to the RAB after lunch.

RESULTS OF LATE 2002 AND 2003 CLEANUP ACTIVITIES

Former Alaska Dormitory

- Work conducted in 2002.
- Removed a UST removed and 140 cubic yards, tank cut in pieces and shipped offisland
- Contaminated soil at the site was excavated up to the building and down to groundwater.
- A water pipe was broken, but it didn't impact excavation though it cut off the building's water supply.
- A "No further Remedial Action Planned" was issued by the State of Alaska.

Decommissioned Power Plant (DPP)

- Work conducted in August and November 2002.
- Approximately 350 cubic yards of PCS removed.
- Excavated as much contaminated soil as possible. Refusal (i.e., rocks preventing excavator from going deeper), utilities, and building limited excavation extent. Some contamination left in place at refusal. Excavated as close to the building as possible, without impacting the integrity of the building.
- Part of the building was demolished.
- UST was found to be filled with water, sand, and contaminated slurry. About 10,000 gallons had to be pumped out.
- Tank was then removed, cleaned, cut up for shipment off-island.

Fuel Transfer Facility and DPP Annex

- This site is actually several smaller sites combined.
- Excavated 300 cubic yards from DPP Annex and 250 cubic yards from fuel transfer facility.
- There are many utilities in the area and thus a lot of hand digging was required.
- Inactive pipes were cut. Those thought to contain product were cold cut, drained, and fuel was recycled.

Former Gasoline/Diesel Fuel Drum Storage Area

- 1160 cubic yards were excavated. Backfilled with about 984 cubic yards of soil.
- Hit refusal in some places where there was still contamination on the rock.

Fouke Bunkhouse

- Decommissioned AST
- Excavated contaminated soil and unearthed an unexpected UST, which was then removed.
- Excavation was limited by the building, hitting groundwater, and utilities.
- Excavated 550 cubic yards of PCS and backfilled the site.

Old Barreling Shed

- One spot with slightly elevated levels of petroleum from an unknown source was excavated. About 10 cubic yards were removed.
- Two confirmation samples were taken and both came back below 250 ppm.

Tract 50

- NOAA conducted Transite (asbestos) tile removal.
- Wore protective clothing and used an air quality monitor to ensure workers were not inhaling asbestos fibers.
- Picked up pieces by hand.
- TDX inspected the site and signed an official certification that it is clean.
- Asbestos containing materials were stored in drums for shipment off island.

Former Gas Station and Garage

- In 1995, a NOAA contractor collected samples.
- Later, a contractor removed a tank.

Question: Were samples taken on the west side of the site?

Ron says the tanks were located there. This data was not shown on figure presented, though it is likely samples were taken when the tanks were removed.

Action Required: NOAA will check to see if it has this data.

Anderson Building and Five Car Garage (Mike's Auto)

- 90 cubic yards total was removed from two excavation areas and one test trench/pit, with 40 cubic yards removed on east side of Five Car Garage.
- 108 cubic yards of clean backfill were replaced into the excavation areas and the test pit.
- Cable and water line complicated excavation on the east side of the Five Car Garage.
- The test trench/pit was excavated south of the garage in Sandy Lane at the request of local citizens and a sample was collected.
- One confirmation sample came back above 250 ppm, but it was under 2,500 ppm (Tens Times Rule). This sample was taken from the sidewall of the excavation just to the east of the 5-Car Garage building.

Parcel 6 F (Headstart Building and Duplex)

- Total of 170 cubic yards excavated
- Two USTs removed, one from each side of duplex
- Utility lines on west side of duplex and near Headstart Bldg. complicated excavation.
- Telephone line near northeast corner of Headstrart Bldg. limited excavation. DRO above 2,500 ppm left in place there.

Discussion:

- Elary inquired about the issue of FUDS vs. NOAA sites, stating that if it is a FUDS then there is a small chance that the Deptarment of Defense will get here to address the issue any time soon. This could hold up land transfer and TDX might not want to accept this piece of property.
- John L. said the Navy transferred the land to Department of Interior (DOI) but it is still considered a FUDS. NOAA removed the USTs because DOI used them.

• Elary states that he recalls seeing previous data that indicated that a much larger plume was present. John explains that what he is talking about is from a CESI report that is still under review. CESI based the plume on limited data points.

Question: How was the layover of historic buildings on the current arial photo created?

Laura Murray explained that this layover is based on the best available information, a 1918 photo. A discussion followed about locations of historic buildings. Some think the 15 500-gallon tanks are in the wrong place. Laura stated that that is possible. John R. said he thinks the 500-gal tanks should fall in line with the hot spot left in place at Headstart Bldg.

Action Required: NOAA will revise the layover of historic buildings.

Lot 102 (former teacher housing)

- 50 cubic yards removed
- 1000-gallon UST removed
- Excavation approximately 18 feet deep
- Excavation limited by proximity to house and reach of the excavator
- The data is not yet back for the confirmation samples.
- A monitoring well was installed down gradient to House 102.

Machine Shop/Municipal Garage/Equipment Shed

- About 2800 cubic yards excavated
- Excavated up to foundation of building
- Near NE corner of building had to hand dig due to a lot of utilities
- Results of confirmation sampling not yet available
- Separate from corrective action activities, soil under building was investigated using a
 GeoProbe to drill through the floor of the building. Preliminary results show GRO
 below cleanup but DRO above Ten Times Rule. DRO is much less mobile than
 GRO.

Former Diesel Tank Farm

- Excavated 6,550 cubic yards
- Replaced 8,892 cubic yards
- Results of confirmation sampling not yet available
- Finer scoria used as backfill for top two feet
- Excavation was conducted from the top and sides of the section of water main exposed. However, based on analysis of four samples collected from underneath the main, the decision was made not to excavate under the main because excavation could potentially jeopardize the integrity of the pipeline and because TLC sample results indicated low contamination (three were below ADEC Method Two for diesel range organics, one was 250-500 ppm). Fine scoria was used to backfilled on top of the main.
- Metal strip placed along the water pipeline to allow for better detection of pipeline in the future.

<u>Question</u>: Is the type of contamination left in place "compatible" with the PVC pipe? NOAA said the manufacturer does not address this.

Question: Do State regulations mandate a 5 foot radius of clean soil around the main?

NOAA and ADEC stated that this is not specified in regulations, except for as a criterion in Method One cleanup level determination.

Cascade Building

- A lot of known and unknown utilities at north end of the site. Some utilities are not where they've been indicated to be, so must exercise caution.
- Two USTs at the gas station were removed by BSE in 1997. Subsequently, a NOAA contractor and NOAA conducted sampling in the area. Found that some soil remained contaminated at the site.
- Soil has been excavated on the south and west sides.
- Currently working on the north/northeast side by the road.

<u>Comment</u>: Jason made a comment about a filling station located at the north corner of the site, near the Machine Shop.

AST Saddles

- Concrete saddles removed last week.
- A single hot spot of lead, that is slightly above industrial area standard for lead, exists. Sampled around this spot and did not find other hits. About 1.25 cubic yards of soil removed and placed in super sack for shipment off island. A lead field test kit was used to sample the extents of excavation. Field results below residential standard. Waiting on fixed-laboratory results.
- Currently excavating PCS from area of site away from the lead hot spot.

<u>Comment</u>: Need to restore the electrical conduit at the site. It provides electricity to the gazebo, which lights the Christmas tree.

(Note: Follow up investigation indicated that the lights are powered from the Machine Shop).

Question: Where do you think the lead came from?

NOAA said they are not sure. Likely, not from diesel fuel. Possibly from a battery that may have been thrown there or from lead paint chips.

Blubber Dump – ETC Site

- The site must be properly decommissioned to show the State proof that the ETC system operations did not cause contamination.
- PCS transported from blubber dump to Tract 42 (landfill area).
- Steel plates removed from location of treatment cells.
- Confirmation samples collected this week and will be shipped off island for analysis. If these samples indicate contamination above cleanup levels, then NOAA will address this issue in the next field season.

U.S. Navy Radio Complex (FUDS Designation)

• Discussed with Duplex and Headstart sites (see above)

Question: What happens with a FUDS?

NOAA said it notifies ADEC, and copies the U.S. Corps of Engineers (USACE), regarding the issue and NOAA's position that the site falls under the jurisdiction of the FUDS program. If the State feels that this is an issue, then the State has the ability to enter into discussions with USACE.

ADEC then commented that, compared to the Radio Complex, the USACE has many other sites that may be bigger priorities.

<u>Action Required:</u> NOAA will notify the DOD and the State that this is considered a FUDS. The State will need to go to USACE in the future to get this site addressed.

Summary of NOAA's excavation work to date in the village

The Cascade Building and AST Saddle Complex Site are the last two remaining sites NOAA plans to work on in the village area. NOAA clarified that any work that has begun in 2003 but does not get completed by late November will be taken up again first thing next year. Saltwater wells still need to be closed out. There are confined space issues that must be overcome to do this work.

GENERAL DISCUSSION REGARDING 2003 WORK

Question: Why is the procedure of laying visqueen in the bottom of excavations no longer followed?

NOAA said that its global positioning system (GPS) technology allows them to precisely relocate the extent of excavation so visqueen is not needed for demarcation.

Question: What happens if contamination left in place migrates into clean soil? NOAA stated that the source of the "new" contamination would need to be proven. The visqueen was not intended to prevent recontamination. It actually was supposed to have holes in it to allow rainwater to pass through.

Question: What about contaminated soil under buildings?

ADEC said the state does not require cleanup under buildings. The property owner will be liable should they decide to remove the building at some point.

<u>Comment</u>: Ron indicated that TDX is going to tear down the Machine Shop eventually. ADEC said if the levels under the building are above the Ten Times Rule, then the owner needs to clean up the area. Ron said he'd need to talk with TDX lawyers to see how to handle this issue in the future.

Question: What about contamination under the Cascade Building?

NOAA said there are cables that crisscross and hold up the Cascade Building. It would be difficult to dig under the building. Besides, there are no indications that contamination is above the Ten Times Rule. There is visibly stained soil in the building, so recent spills/leaks from equipment storage could be the source. ADEC said if the contamination is not above the Ten Time Rule, then NOAA would not be required to do any additional remediation. Ron suggests that NOAA use the grader to remove the top foot of soil. NOAA said it'd consider this.

<u>Question</u>: Where was the fuel tank located for the Coal Shed/Carpenter Shop? No one is sure. Jason says there was an AST in place at the time of the construction of the Cascade Building.

Question: Were any samples taken at the south end of the Cascade building? NOAA collected GeoProbe samples from the south end. Refusal was hit at four feet. No hits found.

<u>Question</u>: Are you going to sample using the GeoProbe between the old garage and the machine shop?

NOAA asked if there is a basement in the Machine Shop and if so, if NOAA is being asked to sample under the basement. Elary responded yes.

Action Required: NOAA will consider doing this sampling next field season.

Question: How are wells decommissioned?

NOAA said it uses bentonite to fill them up. It expands when wet.

NOAA CLEANUP ACTIVITIES DURING SUMMER OF 2004

- NOAA plans to work on the following sites next season:
 - Ice House Lake: soil and groundwater contamination
 - Lukanin Bay: PCS and potentially pesticide issues
 - Vehicle Boneyard: Need to cap buried debris, separate from FUDS
 - Salt Lagoon Diesel Seep: mitigating visible sheen in channel
- Work depends on funding and agreements but NOAA expects to at least finish Ice House Lake and Lukanin Bay.
- Some work has already been performed this year at the Vehicle Boneyard. This includes test pitting to determine horizontal and vertical extent of debris and scrapping debris off the surface and into a hole that must be capped regardless. Revegetation will also be required.

CONTRACTING DISCUSSIONS

• Ron inquired about NOAA using Kelly Ryan. He stated that he does not think it's consistent with the intent of Congress. John L. explained difficulty in consummating a contract with BSE. NOAA had to obligate all funds by the end of the fiscal year or risk losing the dollars. Also, the public law reads that NOAA will use local labor to the extent practicable. Kelly Ryan has types of equipment that local contractors do not. This has allowed NOAA to complete work this year at the landfill that would not have otherwise been completed. BSE doesn't have the capacity needed. Kelly Ryan

has hired local labor. NOAA is feeling a lot of pressure to complete the cleanup by FY05, although funding in FY05 is not certain. NOAA feels it has met the intent of the law.

- Ron said he thinks NOAA may be bending rules a little too far in the interest of getting the work done sooner. Using Kelly Ryan at the landfill was one thing, but now they are doing work at the Vehicle Boneyard too.
- John L. said NOAA understands that it has access to a city dump truck but that BSE hasn't been able to provide the labor. Kelly Ryan has the equipment and operators available because another contract fell through.
- Elary stated that BSE could have mobilized equipment if it would have been given notice and opportunity to bid on a contract.
- Richard made the point that there may be an opportunity for on-island entities to utilize/lease Kelly Ryan equipment.
- Jason said some of this work, for example the blubber dump and the vehicle bonyard, could have been done by the locals during the winter. It seemed to him that it took a while for NOAA to mobilize this year and then it was a hurry up and wait game.
- John L. explained that NOAA got the budget late this year. Then the office needed to obligate the money before the end of the fiscal year.
- Myron suggested that contractual issues be discussed at a separate meeting and that this meeting get back to environmental cleanup issues.

REVIEW OF GROUNDWATER WELL LOCATIONS AND INVESTIGATIONS

- NOAA has had a number of new monitoring wells installed. Groundwater monitoring just occurred last week. Should have results of that monitoring by next RAB meeting.
- Tetra Tech is going to investigate/verify the groundwater flow direction.
- Several wells at the landfill were decommissioned this summer when municipal solid waste (MSW) was being consolidated.

Question: Is it possible to do a cross-section/simulation as previously done?

NOAA responded that it will update this for the next RAB once the new information is in from Tetra Tech.

Action Required: NOAA create/update a cross-section for groundwater.

Question: Is there a groundwater monitoring plan?

NOAA said the RAB should have seen a plan for monitoring by early October. Let NOAA know if you didn't get this.

Question: What about monitoring at the landfill?

NOAA said it expects that a number of the wells at the landfill will be used for long-term monitoring. The design is in the works. The landfill does not have to have groundwater monitoring wells because the landfill is classified as a Class 3. However, if the monofill is placed out there then wells would be required.

Question: Could the wells be maintained if the future landowner desires?

Once NOAA no longer needs the wells then it could look into the possibility of allowing these to remain for the new landowner.

Question: What about the wells at the Vehicle Boneyard?

NOAA stated there are no indicators of contamination there. The volume of groundwater is very low. NOAA will probably request the decommissioning of these wells. If the City were to have a landfill out there, then perhaps these could be maintained.

Question: Are there going to be monitoring wells developed at the Blubber Dump? NOAA said there needs to be an indication of soil contamination before placing a well at a location.

Question: I thought there was a big hit on B-6?

NOAA replied there was a chemical found with no known source. The State agreed that there was no known source for the chemical. It was not a typical chemical that NOAA would be responsible for. ADEC recalled that this chemical was below the threshold level as per the State regulations.

Question: How often do you have to sample groundwater? John L. said NOAA has to sample the wells quarterly for at least a year. A future monitoring schedule will be based on results of those samples.

Question: Are there wells at the old drum dump site? NOAA replied this is a FUDS. There are two wells there that Department of Defense may want to assume responsibility for.

Question: We walked by Big Lake a few years back. There was a pipe that comes out from under the road and into the lake. Did you ever find anything out there? NOAA said it does not recall any concerns with this.

TEN TIMES RULE UPDATE

- It was clarified that, technically, NOAA doesn't have approval for the Ten Times Rule yet because no institutional controls are in place. The Ten Times Rule requires that institutional controls be in place.
- NOAA is working on institutional controls with the State. One institutional control may be the designation of a Critical Water Management Area.
- A Critical Water Management Area is an area where the use of groundwater is restricted in some manner. In this case, the placement of drinking water wells inside the area would be restricted.
- Department of Natural Resources (DNR) is being petitioned by ADEC to create a
 Critical Water Management Area on St. Paul. The DNR has asked ADEC/NOAA to
 identify ranges and sections for the area NOAA would like classified. ADEC just
 sent a letter to DNR along with maps NOAA provided.
- Four sections of the island are included in the request to DNR. These sections include the village, Ice House Lake, Lukanin Bay, and Public Works, and are consistent with input provided by some stakeholders.

- Ron stated he thinks the area is too large. As landowner, BSE is not interested in having a lot of restrictions placed on their resources.
- A public hearing regarding the Critical Water Management Area designation must be held on island and a public notice must be posted. These are opportunities to comment.
- A Critical Water Management Area is not strictly linked to the Ten Times Rule; they wouldn't necessarily have the same boundaries.

Question: Can the Ten Times Rule boundary be expanded as far as to the airport, in particular, to encompass Ellerman Heights (Windmill Wells), the Salt Lagoon Channel, and Public Works?

John Lindsay indicated that, according to ADEC, a study would need to be done to support the Ten Times Rule in other areas. He then suggested that NOAA, TDX, and the City work together to look at this.

Action Required: NOAA, TDX, and City assess need to expand Ten Times Rule area.

Question: Why is NOAA requesting four sections for the Critical Water Management Area?

NOAA said it is proposing those four sections because there is at least one cleanup site that affects each of those sections.

LANDFILL CLOSURE AND PETROLEUM CONTAMINATED SOIL STOCKPILE

- John Lindsay showed figures with the before and after contours of Cells A, B, and C.
- Moved 13,000 cubic yards of municipal solid waste from Cell B.
- Capped Cell A
- 1,200 cubic vards of PCS removed from Cell B and moved to stockpile
- Worked with City to construct a pad where the burn box activities will occur. The pad is elevated to plus 22 feet MSL as measured by NOAA GPS. There is a cell adjacent to the pad for dumping of ash from the burn box. ADEC has approved this, though still in the process of getting the permits signed.
- The slopes of the pad have been covered with jute that is stapled together. The jute has been seeded but will probably have to be reseeded next year.
- Constructed a staging area to hold the waste from the village cleanup.
- Still need to cap Cell C when the City stops using it in the near future.
- City developing short-term landfill that is estimated to provide a 10-year lifespan for solid waste and ash disposal.
- It is important to work together to dispose of waste in an efficient, effective, and collaborative manner.
- Proposed road to new landfill is in the State system and BIA system, though it will take time to get road dollars to improve the turnpike from the airport to the Aalax turnoff and then build an access road to new landfill site.

DISCUSSION OF THE REDRAFTED RESOLUTION FROM JUNE RAB SUBCOMMITTEE MEETING

- John R. Merculief asked for the new version to be read into the official record. Paula Souik read the resolution. It was proposed that the revised resolution be the substitute resolution for the resolution signed in June.
- John R. Merculief asked a question regarding the revised version still saying that moving the PCS out of the Ten Times Rule area was a violation of state regulations even though Louis Howard said earlier that it wasn't.
- Island co-chair called a roll call vote on the resolution. Eight yes votes to pass the resolution. One no vote. Resolution passed.
- John R. Merculief stated that his vote is on behalf of the city as people have expressed concern about the proposed location of the monofill.

HISTORIC PRESERVATION

• John L. met with the Alaska State Historic Preservation Office (SHPO) last week. Language in the Memorandum of Agreement between NOAA and SPHO is close to being agreed on. Once this happens, the agreement will be available to island entities for review and comment.

Question: how does this affect future landowners? NOAA stated that it understands that future private entity owners would have no commitments.

PUBLIC COMMENTS

- John R. asked about the wear on the roads from their utilization by the heavy equipment. Ron said he thinks the road to Ridge Wall will have to be recapped.
- NOAA explained it has a purchase order with the City for road maintenance.
- John R. explained the City does not have access to scoria or a budget to buy scoria. All the City can do is regrade the roads. Material is needed to repair the road to Ridge Wall.
- John L. said NOAA currently does not have access to scoria sources that belong to local entities. NOAA would prefer to purchase backfill from local sources but feels it is being pressured to seek other sources.
- Elary said quarry sources have to be evaluated per the management plan. These areas need to be restored after their life. We are not denying you scoria, but we need to survey these areas first.
- John L. asked when that would be done?
- Elary said he's here now, but need to get surveyor back out here.
- Ron stated that he's asked that NOAA no longer take from Polovina because it is nearly depleted. Recommended Telegraph Hill should be used for deeper backfill and Ridge Wall for surface backfill. Ridge Wall is good material and should be saved for use on surface.
- Victor said he is concerned about Ridge Wall being an eye sore visible from town.
- Comment that Kelly Ryan trucks are causing a big concern for the structure of the roads. It has been found that the larger trucks have a greater impact on the roads.

• Jim W. said that the per unit weight load of Kelly Ryan's truck may be less than 10 yarders. Elary replied that Polarconsult previously did study on the per unit weight load of larger trucks used by Kelly Ryan and that their per unit weight load is more.

Action Required: Determine who will fix the roads and with what material.

NEXT MEETING

- STG RAB recommended next meeting be a joint STG-SNP meeting in Anchorage the third week of February 2004 to discuss NOAA's budget and plans for next field season.
- SNP RAB voted unanimously to have next RAB either at the end of February or beginning of March 2004 in Anchorage.

ADJOURN

The meeting adjourned at 4:00 p.m.